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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ALICIA M. GENNA,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, TRANS UNION, LLC, GENESIS
CREDIT MANAGEMENT, LLC, CAPITAL
ONE BANK, KOHLS INC, and TD BANK
USA,

Defendants.

Case No. 2:22-cv-01429-GMN-EJY

**JOINT STIPULATION AND ORDER
EXTENDING DISCOVERY DEADLINES
(FIRST REQUEST)**

Plaintiff Alicia M. Genna (“Plaintiff”), and Defendants Trans Union LLC (“Trans Union”), Equifax Information Services, LLC (“Equifax”) and TD Bank USA, N.A. (misnamed as “TD Bank USA”) (“TD”) (“the Parties”) hereby jointly move to extend all deadlines set forth in the Stipulated Discovery Plan and Scheduling Order filed with this Court on November 10, 2022, (ECF No. 27) by a period of sixty (60) days.

1. On September 2, 2022, Plaintiff filed her Complaint (ECF No. 1), against Defendants Trans Union, Equifax and TD.

1 2. Trans Union filed its Answer to Plaintiff's Complaint on September 27, 2022
2 (ECF No. 10). TD filed its Answer to Plaintiff's Complaint on October 7, 2022 (ECF No. 12).

3 3. On October 7, 2022, Plaintiff filed her Amended Complaint (ECF No. 13), against
4 Defendants Trans Union, Equifax and TD.

5 4. Trans Union filed its Answer to Plaintiff's Amended Complaint on October 10,
6 2022 (ECF No. 14). Equifax filed its Answer to Plaintiff's Amended Complaint on October 26,
7 2022 (ECF No. 18). TD filed its Answer to Plaintiff's Amended Complaint on November 2,
8 2022 (ECF No. 22).

9 5. The parties have completed the following discovery to date: The parties have
10 exchanged initial disclosures, Plaintiff has served her first set of document production, Plaintiff
11 served written discovery requests to all Defendants on December 12, 2022 and December 30,
12 2022, Trans Union served written discovery requests to Plaintiff on January 31, 2023, and
13 Equifax has settled with Plaintiff and is currently finalizing settlement terms and agreements.

14 6. The parties still need to conduct depositions, potentially additional written
15 discovery, serve subpoenas, conduct third-party depositions, and conduct expert discovery.

16 7. The Parties require more time and accompanying deadlines from the Court to
17 adequately conduct discovery due to scheduling conflicts. The parties are also discussing
18 settlement.

19 8. Good cause exists for the requested extension, namely, this action involves three
20 remaining defendants, each with their own separate claims and affirmative defenses. Given that
21 plaintiff will propound and respond to discovery with each defendant, potentially conduct
22 depositions for each defendants' witnesses located across the country, may retain at least one
23 expert, and must coordinate with counsel for each defendant, the Parties cannot fully investigate
24 and litigate this action within the standard discovery period .

25 9. The additional time will allow the Parties to conduct additional fact discovery,
26 including taking depositions, potentially additional written discovery, acquiring all documents
27 from third-parties, resolving any discovery issues, and additional time to adequately determine
28 whether expert discovery will be needed in this matter. The Parties have also engaged in

1 settlement discussions and the additional time will assist in continuing those discussions and
 2 explore a mediation or settlement conference

3 10. No party will be prejudiced by this Court granting this Stipulation as all parties
 4 jointly seek an extension of these deadlines. Moreover, the Parties believe that allowing the
 5 extension will serve the ends of judicial economy.

6 11. Moreover, the requested extensions are not sought for the purposes of delay.

7 12. This is the Parties' first request to extend these deadlines.

8 13. Accordingly, the parties request adoption of the following deadlines:

9 **a. Discovery Plan:**

10 Discovery Cut-off **05/26/2023**

11 Deadline to Disclose Rebuttal Expert Disclosures **04/28/2023**

12 Deadline to File Dispositive Motions **06/26/2023**

13 **b. Pre-Trial Order:** The parties shall file a joint pretrial order no later than
 14 **07/26/2023** or thirty (30) days after the date set for filing dispositive motions. In the event that
 15 parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until
 16 thirty (30) days after decision on the dispositive motion or further order of the Court.

17 WHEREFORE, Plaintiff and Trans Union, Equifax and TD respectfully request this
 18 Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a
 19 new Scheduling Order to reflect the requested extension.

1 DATED: January 31, 2023

2 **QUILLING, SELANDER, LOWNDS,**
3 **WINSLETT & MOSER, P.C.**

4 /s/ Rachael Swernofsky

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22 **Counsel for Equifax Information Services**
23 **LLC**

24 **IT IS SO ORDERED.**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 Dated this 31st day of January, 2023.
28

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/s/ Miles N. Clark

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